

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, . Docket No.
Government, . 1:24-CR-00346-BMC-2
v. .
LINDA SUN AND CHRIS HU, . Brooklyn, New York
Defendant. . Tuesday, September 3, 2024
3:14 p.m.

TRANSCRIPT OF INITIAL APPEARANCE FOR ARRAIGNMENT
BEFORE THE HONORABLE PEGGY KUO
UNITED STATES MAGISTRATE JUDGE

APPEARANCES:

For the Plaintiff: United States Attorney's Office
ALEXANDER A. SOLOMON, AUSA
ROBERT POLLACK, AUSA
271 Cadman Plaza East
4th Floor
Brooklyn, New York 11201
718-254-6074

For the Defendant, Chris
Hu: Bracewell, LLP
SETH DAVID DUCHARME, ESQ.
NICOLE BOECKMANN, ESQ.
ANISSA LAURA ADAS, ESQ.
31 West 52nd Street
Suite 1900
New York, New York 10019
212-508-6165

For the Defendant, Linda Sun
Abell Eskew Landau, LLP
JARROD L. SCHAEFFER, ESQ.
KENNETH M. ABELL, ESQ.
256 5th Avenue
5th Floor,
New York, New York 10001

Also Present: Linda Sun, Defendant
Chris Hu, Defendant

Mary Clare McMahon, Litigation
Analyst
Felicia Lock, Suretor
Stephen Wong, Suretor
Chi Seng Chung, Suretor
En Chang Yang, Suretor

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1 P R O C E E D I N G S

2 THE COURTROOM DEPUTY: Case number 24cr346, United
3 States versus Linda Sun and Chris Hu. Counsel, starting with
4 Plaintiff, please state your appearances?

5 MR. SOLOMON: Good afternoon, Your Honor. Alex
6 Solomon for the Government, joined by Robert Pollack and
7 analyst, Mary Clare McMahon. We also have seated at
8 Government table, two agents from the FBI.

9 MR. SCHAEFFER: Good afternoon, Your Honor. Jarrod
10 Schaeffer and Ken Abell, Abell Eskew Landau, for Ms. Linda
11 Hu, who's sitting at my right.

12 THE COURT: All right.

13 MR. DUCHARME: And for Chris Hu, Seth DuCharme.
14 I'm joined by my colleagues, Nicole Boeckmann and Anissa
15 Adas. Good afternoon, Your Honor.

16 THE COURT: All right.

17 MS. BOECKMANN: Good afternoon.

18 THE COURT: Good afternoon, everyone. The purpose
19 of the proceeding today is to make sure that the defendants
20 understand their rights and what they're charged with and to
21 determine whether they should be released on bail or held in
22 jail.

23 Ms. Sun and Mr. Hu, you have the right to remain
24 silent. You are not required to make any statements. If
25 you've made any statements, you don't need to make any more.

1 If you start to make a statement, you can stop at any time.

2 Any statements you do make can be used against you.

3 Ms. Sun, do you understand?

4 DEFENDANT SUN: Yes, Your Honor.

5 THE COURT: Mr. Hu, do you understand?

6 DEFENDANT HU: Yes, Your Honor.

7 THE COURT: You have the right to an attorney. If
8 you cannot afford one, the Court will appoint someone to
9 represent you. I understand that you each have retained
10 counsel.

11 Ms. Sun, you have been charged by a grand jury in
12 an indictment dated August 26, 2024, with the following
13 counts: conspiracy to violate the Foreign Agents
14 Registration Act, failure to register under the Foreign
15 Agents Registration Act, visa fraud, four counts of bringing
16 in aliens, and money laundering conspiracy. Did you receive
17 a copy of the indictment?

18 DEFENDANT SUN: Yes, Your Honor.

19 THE COURT: Have you had a chance to talk to your
20 lawyer about it?

21 DEFENDANT SUN: Yes, Your Honor.

22 THE COURT: Do you understand what you're charged
23 with?

24 DEFENDANT SUN: Yes, Your Honor.

25 THE COURT: Do you want me to read the charges out

1 loud, or do you waive a public reading?

2 DEFENDANT SUN: I'll waive a public reading.

3 THE COURT: How do you plead to the charges, guilty
4 or not guilty?

5 DEFENDANT SUN: Not guilty.

6 THE COURT: Thank you. Mr. Hu, you are charged
7 with the following counts in the indictment: conspiracy to
8 commit bank fraud, misuse of means of identification, and
9 money laundering conspiracy. Did you receive a copy of the
10 indictment?

11 DEFENDANT HU: Yes, Your Honor.

12 THE COURT: Did you have a chance to talk to your
13 lawyer about it?

14 DEFENDANT HU: Yes, Your Honor.

15 THE COURT: Do you understand what you're charged
16 with?

17 DEFENDANT HU: Yes, Your Honor.

18 THE COURT: Do you want me to read the charges out
19 loud?

20 DEFENDANT HU: No, Your Honor.

21 THE COURT: All right. And how do you plead to the
22 charges, guilty or not guilty?

23 DEFENDANT HU: Not guilty.

24 THE COURT: Thank you very much. So I will take
25 the opportunity now to remind the prosecution, pursuant to

1 Federal Rule of Criminal Procedure 5f, of its obligation
2 under Brady versus Maryland and its progeny to disclose to
3 the defense as soon as reasonably possible all information,
4 whether admissible or not, that is favorable to the
5 defendants and material either to guilt or to punishment.
6 Possible consequences of noncompliance may include dismissal
7 of individual charges or the entire case, exclusion of
8 evidence, and professional discipline or court sanctions on
9 the attorneys responsible for the noncompliance.

10 I will be entering a written order that more fully
11 describes this obligation and the possible consequences of
12 failing to meet it. I direct the prosecution to review and
13 comply with that order.

14 Mr. Solomon, does the prosecution confirm that it
15 understands its obligations and will fulfill them?

16 MR. SOLOMON: We so confirm.

17 THE COURT: All right. Thank you very much,
18 everyone. So with respect to bail, I understand the parties
19 have reached an agreement and the Government is not seeking
20 detention of this case; is that right?

21 MR. SOLOMON: That is correct.

22 THE COURT: Okay. So let me hear from you what the
23 conditions are.

24 MR. SOLOMON: Broadly speaking, Your Honor, the
25 conditions are a \$1.5 million bond for Ms. Sun and a \$0.5

1 million bond for Mr. Hu, with certain travel restrictions and
2 otherwise standard limitations. With respect to Ms. Sun,
3 there's also travel limitation of no travel to the PRC
4 Consulate or Mission here in New York City.

5 THE COURT: Okay. There are different suretors for
6 each person. Okay. So from counsel, I'll hear from each of
7 you about the suretors that you're proposing.

8 MR. SCHAEFFER: Thank you, Your Honor. We are
9 proposing three suretors for Ms. Hu. Two of them would sign
10 the bond today, and they're here outside the courtroom, and
11 one is not available today but has been interviewed by the
12 Government over the phone. We understand that all three of
13 them are acceptable to the Government.

14 THE COURT: Okay. Great. And then, Mr. DuCharme?
15 Oh, yes.

16 MS. BOECKMANN: Yes, Your Honor. We have two
17 suretors, both of whom have been interviewed by Mr. Solomon,
18 and we propose they are both present in court and prepared to
19 sign the bond today.

20 THE COURT: Okay. So I'll have each of the
21 suretors come up, and I'll speak to each of them.

22 THE CLERK: The judge is going to ask some
23 questions, so I'm going to put you under oath. Please raise
24 your hand.

25 EN CHANG YANG, WITNESS, sworn

1 FELICIA LOCK, WITNESS, sworn

2 STEPHEN WONG, WITNESS, sworn

3 CHI SENG CHUNG, WITNESS, sworn

4 THE CLERK: State your name for the record.

5 MR. YANG: Name? En Chang Yang (ph.).

6 THE CLERK: Thank you.

7 MS. LOCK: Felicia Lock (ph.).

8 MR. WONG: Stephen Wong (ph.).

9 MR. CHUNG: Chi Seng Chung (ph.).

10 THE CLERK: Thank you.

11 THE COURT: All right. Good afternoon, everyone.

12 MR YANG: Hi.

13 THE COURT: I understand that you are each willing
14 to act as a suretor, Ms. Lock and Mr. Yang, for Linda Sun,
15 and then Mr. Chung and Mr. Wong for Mr. Hu, for Brian
16 Hu -- sorry, for Chris Hu. Let me explain to you what it
17 means to be a suretor, and then I will ask you if you
18 understand what it means and whether you still want to act as
19 a suretor. So I'm going to ask you a couple of questions
20 first.

21 I'll start with Mr. Yang. How do you know Linda
22 Sun?

23 MR. YANG: Her son and my son, they are like best
24 friend.

25 THE COURT: All right. And how long have you known

1 each other?

2 MR. YANG: Around seven year.

3 THE COURT: Are you working?

4 MR. YANG: Yes.

5 THE COURT: What kind of work do you do?

6 MR. YANG: I'm in construction.

7 THE COURT: Okay. And approximately how much money
8 do you make?

9 MR. YANG: For -- for company?

10 THE COURT: You personally.

11 MR. YANG: Around 100,000.

12 THE COURT: Okay. Thank you. And then, Ms. Lock,
13 how about you? How do you know Linda Sun?

14 MS. LOCK: Through my husband, Stephen. Through my
15 husband, Stephen.

16 THE COURT: And how long have you known each other?

17 MS. LOCK: Maybe about five, six years.

18 THE COURT: Are you working?

19 MS. LOCK: I work for my husband's company.

20 THE COURT: Okay. And approximately how much money
21 do you make?

22 MS. LOCK: Whatever my husband gives me.

23 THE COURT: Give me a range.

24 MS. LOCK: I -- I -- \$500 -- \$500 and -- yeah, oh,
25 I guess a week, maybe.

1 THE COURT: Okay. The reason I'm asking about
2 money is because acting as a suretor has financial
3 consequences to you.

4 MS. LOCK: Sure.

5 THE COURT: And so I want to make sure that you're
6 able --

7 MS. LOCK: Yes.

8 THE COURT: -- to fulfill the obligations and then
9 also that you understand the consequences to you --

10 MS. LOCK: Yes.

11 THE COURT: -- if each of the defendants fails to
12 comply --

13 MS. LOCK: Sure.

14 THE COURT: -- with the conditions, okay?

15 MS. LOCK: Yeah.

16 THE COURT: So I don't mean to ask you very
17 personal questions.

18 MS. LOCK: No. That's fine.

19 THE COURT: I just need to at least establish some
20 foundation.

21 MS. LOCK: Sure. Sure.

22 THE COURT: Okay? And so, Mr. Wong, tell me how
23 you know Chris Hu.

24 MR. WONG: I used to do business with him about,
25 like, nine years ago.

1 THE COURT: Okay. And what kind of work do you do?

2 MR. WONG: I own a seafood company.

3 THE COURT: And approximately how much money do you
4 make?

5 MR. WONG: About, like, 95,000 a year.

6 THE COURT: Okay. Thank you. And Mr. Chung, how
7 do you know Chris Hu?

8 MR. CHUNG: I've known Chris Hu over 20 years.

9 THE COURT: All right. And what do you do?

10 MR. CHUNG: I wholesale import footwear.

11 THE COURT: And approximately how much money do you
12 make?

13 MR. CHUNG: 75,000 a year.

14 THE COURT: Okay. Thank you, everyone. As I
15 mentioned, the reason I'm asking you about the money is that
16 I am releasing Ms. Sun today on a \$1.5 million bond and Mr.
17 Hu on a \$500,000 bond. You don't have to pay the money
18 today, and it's possible, if all goes well, that you don't
19 have to pay anything ever, okay? But if they violate any of
20 the conditions of release, which I'm going to describe in a
21 moment, then you are agreeing to pay the Government that
22 amount. And so for Ms. Lock and Mr. Yang, that's \$1.5
23 million.

24 MR. YANG: Yes.

25 THE COURT: All right. And for Mr. Chung and Mr.

1 Wong, it's \$500,000. Now, just because they're two for
2 each -- two suretors on each of these bonds, it doesn't mean
3 you're splitting the money 50-50. The Government could come
4 after you for the entire amount, so this is a very serious
5 financial obligation. And like I said, if the defendants do
6 comply with all the conditions of release, then you don't
7 have to pay anything, and they can stay in the community
8 pending the trial, all right? So this is very important, and
9 I want to make sure you understand what this means.

10 So I'm going to go over the conditions of their
11 release. And Ms. Sun and Mr. Hu, I want you to listen
12 carefully because at the end of this, I'm going to ask you if
13 you understand and agree to comply with these conditions. So
14 for each of you, for Ms. Sun and for Mr. Hu, you must appear
15 for all your court appearances. If you don't appear, in
16 addition to having your bond revoked, you could also face an
17 additional criminal charge for failure to appear. You must
18 not commit any federal, state, or local crime while on
19 release.

20 You must cooperate in the collection of a DNA
21 sample if that's authorized by law. You must advise the
22 Court in writing before you change your residence or your
23 phone number. You may not possess a firearm, destructive
24 device, or other dangerous weapon. You may not use or
25 unlawfully possess a narcotic drug except with a prescription

1 by a licensed medical practitioner. This is a reminder that
2 marijuana is still illegal under Federal Law.

3 Now, the specific conditions of release that apply
4 to both Mr. Hu and Ms. Sun is that they will be placed under
5 the supervision of pretrial services. So you will have to
6 report to pretrial services as they direct you in person,
7 online, by phone, or otherwise, and they will come visit you
8 at home, and if you're working, at your place of employment
9 to check in on you. You must surrender any passport. I
10 understand the passports have already been taken away. You
11 may not obtain any other passport or travel
12 document -- international travel document.

13 You will both have travel restrictions limiting you
14 to New York City and Long Island as well as to Maine and New
15 Hampshire. So you can't leave those places. If you're
16 getting from here to Maine or New Hampshire, you can travel
17 through other states, obviously, to get there, but you may
18 not linger in those places. And I always point out to people
19 that these travel restrictions don't include upstate New
20 York, and they don't include New Jersey, so it really means
21 that you do need to stay within New York City and Long
22 Island, except to travel to Maine and New Hampshire.

23 For Ms. Sun, you have the additional condition that
24 you may not have any contact with the People's Republic of
25 China Consulate and Mission, and so you may not go there, you

1 may not have contact with anybody affiliated with that
2 entity, you may not have any contact by phone, by email, by
3 social media, no contact at all. So please make sure that
4 you understand that. And so these are the conditions of
5 Chris Hu and Linda Sun's release.

6 If they comply, like I said, then they can stay out
7 in the community pending their trial, but if you violate any
8 of these you could have the bond revoked, which means that
9 you will be held in detention pending trial, and the suretors
10 will have to pay the bond, all right?

11 So Mr. Yang, do you understand the conditions of
12 Linda Sun's release?

13 MR. YANG: Yes.

14 THE COURT: Do you understand the consequences to
15 you if she violates?

16 MR. YANG: Yes.

17 THE COURT: Do you still want to act as a suretor?

18 MR. YANG: Yes.

19 THE COURT: All right. And Ms. Lock, do you
20 understand the conditions of Linda Sun's release?

21 MS. LOCK: Yes.

22 THE COURT: Do you understand the consequences to
23 you if she violates?

24 MS. LOCK: Yes.

25 THE COURT: Do you still want to act as her

1 suretor?

2 MS. LOCK: Yes.

3 THE COURT: And Mr. Wong, do you understand the
4 conditions of Chris Hu's release?

5 MR. WONG: Yes.

6 THE COURT: Do you understand the consequences to
7 you if he violates?

8 MR. WONG: Yes.

9 THE COURT: Do you still want to act as a suretor?

10 MR. WONG: Yes.

11 THE COURT: Mr. Chung, do you understand the
12 conditions of Chris Hu's release?

13 MR. CHUNG: Yes.

14 THE COURT: Do you understand the consequences if
15 he violates?

16 MR. CHUNG: Yes.

17 THE COURT: And do you still want to act as a
18 suretor?

19 MR. CHUNG: Yes.

20 THE COURT: All right. So I'm going to hand each
21 of you the form so that you can fill in -- you have to fill
22 in your address as well and then sign that indicates that you
23 understand the conditions of your release and agree to act as
24 a suretor for Ms. Sun or for Mr. Hu.

25 Now, Ms. Sun, I want to make sure you understand as

1 well all the conditions of your release?

2 DEFENDANT SUN: Yes, Your Honor.

3 THE COURT: Do you agree to abide by all these
4 conditions?

5 DEFENDANT SUN: Yes, Your Honor.

6 THE COURT: Do you understand the consequences to
7 you and to your suretors if they fail to comply?

8 DEFENDANT SUN: Yes, Your Honor.

9 THE COURT: All right. And when the suretors are
10 done signing, I will ask you to sign as well indicating your
11 agreement.

12 Mr. Hu, do you understand the conditions of your
13 release?

14 DEFENDANT HU: Yes, Your Honor.

15 THE COURT: Do you understand the consequences to
16 you and your suretors if you violate?

17 DEFENDANT HU: Yes, Your Honor.

18 THE COURT: And do you agree to abide by all these
19 conditions?

20 DEFENDANT HU: Yes, Your Honor.

21 THE COURT: All right. So as soon as they're done,
22 we'll have that form passed up to you to sign.

23 And I understand that there is going to be a third
24 suretor; is that right?

25 MR. SCHAEFFER: That's right, Your Honor.

1 THE COURT: When will that person sign?

2 MR. SCHAEFFER: That person will sign within the
3 next two days.

4 THE COURT: Okay. So that should happen. Please
5 contact the Court to make that happen, but of course, Ms. Sun
6 will be released today --

7 MR. SCHAEFFER: Absolutely.

8 THE COURT: -- notwithstanding that that remains
9 outstanding.

10 Now, while we're doing this, Mr. Solomon, is there
11 anything else from the Government?

12 MR. SOLOMON: So the initial status conference
13 before Judge Cogan is on September 25th at 3:30 p.m., and the
14 parties have tentatively discussed excluding time. I'm not
15 sure if it's agreeable yet to the defense, so I await to hear
16 their position.

17 THE COURT: Okay.

18 MR. DUCHARME: Your Honor, with respect to Mr. Hu,
19 I've explained to Mr. Hu his rights under the speedy trial
20 act, and it's my understanding that Mr. Hu would like to
21 exercise those rights and pursue a speedy trial, so we'll not
22 be excluding time at today's appearance.

23 THE COURT: All right.

24 MR. SCHAEFFER: With respect to Ms. -- Mrs. Hu as
25 well, Your Honor, she is anxious to address these charges and

1 while we may revisit that decision if it turns out that
2 discovery is voluminous or there is a legitimate reason to
3 exclude time, at this point, we are not prepared to do so.

4 THE COURT: All right. Thank you. So the
5 exclusion of time does not require the consent of the parties
6 if the Court finds that the interests of justice are served.
7 At the moment, I don't have enough information to show that
8 there's a -- the interests of justice are served by excluding
9 the 22 days between now and September 25th.

10 MR. SOLOMON: I'm happy to articulate some reasons
11 for excluding time, Your Honor.

12 THE COURT: Okay. Let me excuse the suretors.

13 So for the suretors --

14 Felix, have they all signed?

15 THE CLERK: Yes.

16 THE COURT: Okay. So you're excused. Now, before
17 you go, I should remind you that being a suretor is
18 completely voluntary. You don't have to do it. So if at any
19 point you have any doubts, questions, second thoughts, you
20 should let the Court know, so that we can discuss your
21 concerns, okay?

22 MR. YANG: Okay.

23 THE COURT: All right. Thank you very much.

24 MR. YANG: Thank you.

25 MS. LOCK: Thank you.

1 THE COURT: All right. Mr. Solomon, I'll hear you.

2 MR. SOLOMON: Yes, Your Honor. We expect at the
3 status conference before Judge Cogan to ask that this case be
4 designated as a complex case. That's important due to the
5 substantial amount of discovery, much of which is in Chinese
6 language, both written and voice recordings. There are
7 numerous iCloud accounts that were recovered as part of the
8 underlying investigation.

9 Much of the underlying material is contained in
10 WeChat communications, which are in Chinese language, and so
11 there's going to be, I imagine, considerable negotiations
12 with the defense as to the appropriateness of certain draft
13 translations. Additionally, there will be litigation into
14 the Classified Information Procedures Act. And we think for
15 those reasons alone, Judge Cogan will designate this case is
16 complex and that provides this Court with a basis for finding
17 that interest of justice compel an exclusion of time.

18 THE COURT: All right. Has any discovery been
19 exchanged to date?

20 MR. SOLOMON: Not yet, Your Honor.

21 THE COURT: Okay. Do either defense counsel want
22 to address this?

23 MR. DUCHARME: So just with respect to the counts
24 against Mr. Hu, I mean, Mr. Hu is charged with bank fraud,
25 money laundering, and misuse of identification, and the

1 Government provided allegations in extraneous detail
2 throughout this whole indictment. Frankly, the case against
3 Mr. Hu does not appear to be that complex. Obviously, if
4 there's CIPA litigation down the road that -- pertaining to
5 these charges, we can revisit that, but Mr. Hu today stands
6 accused of what are relatively conventional familiar charges
7 in this courthouse. They are not overly complex in nature,
8 as alleged, and Mr. Hu would like to proceed with a speedy
9 trial.

10 MR. SCHAEFFER: And yes, Your Honor. We've already
11 been in conversation with the Government and provided drives
12 and such for the turnover of electronic evidence. I
13 understand that much of it may be in the Chinese language,
14 but I would expect the Government has already translated much
15 of that in order to actually bring these charges. And if
16 they haven't, that's, you know, a separate issue.

17 To the extent that there is CIPA litigation,
18 perhaps we -- that will be a reason to address the exclusion
19 of speedy trial time, but as of this point, we have no
20 information regarding that. And again, the Government just
21 acknowledged that it knows its discovery burdens that
22 includes classified evidence, and so presumably they have
23 already considered the steps that they would take to produce
24 that evidence if required. So again, we're happy to revisit
25 it. We're not trying to be difficult. But right now, we

1 don't see a basis for excluding time.

2 THE COURT: All right. So yes, Mr. Solomon?

3 MR. SOLOMON: Just to quickly address Mr.
4 DuCharme's point. With respect to the financial fraud
5 charges in this case, the defendants' operated a multitude of
6 shell entities and business entities. There were more than
7 80 different accounts whose materials were subpoenaed as part
8 of the underlying financial investigation, so this is no
9 ordinary financial fraud. With respect to CIPA litigation,
10 that's under the Classified Information Procedures Act, we do
11 not expect that we will have to get cleared counsel, but
12 there will be litigation to deal with certain materials.

13 THE COURT: All right. So under the Speedy Trial
14 Act, the defendants are entitled to a trial within 70 days,
15 right, so that means that it would be in November. Based on
16 the information that I've read in the indictment and what I'm
17 hearing from the Government, there is a lot of information
18 that needs to be disclosed and exchanged. The status
19 conference before Judge Cogan isn't for another three weeks,
20 and so at that point, if there's going to be a problem and
21 the parties want to go forward without excluding further
22 time, you're free to do that, but I think in the interest of
23 justice, I will exclude the time between now and that status
24 conference so that the parties can start exchanging
25 information and see what's at issue here.

1 Like I said, based on the 68-page indictment, it
2 does seem like there's a lot of information here, and Judge
3 Cogan may or may not designate it formally as a complex case,
4 but from where I sit, I think it makes sense in the interest
5 of justice to exclude the time so that everybody has a chance
6 to figure out what the evidence in this case will consist of.
7 So I will sign the order of excludable delay excluding the
8 time between now and September 25th.

9 All right. Mr. Solomon, anything else?

10 MR. SOLOMON: Nothing from the Government. Thank
11 you, Your Honor.

12 THE COURT: All right. And for the defense.

13 MR. DUCHARME: No, Your Honor. Thank you.

14 THE COURT: All right.

15 MR. SCHAEFFER: No, Your Honor.

16 THE COURT: Okay. Thank you very much, everyone.
17 I signed the orders releasing Ms. Sun and Mr. Hu, so that's
18 it for today. Thank you, everybody.

19

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21 (Proceedings adjourned at 3:35 p.m.)

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1 TRANSSCRIBER'S CERTIFICATE

2 I certify that the foregoing is a correct
3 transcript from the electronic sound recording of the
4 proceedings in the above-entitled matter.

5

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September 5, 2024

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Natalie C. Webb

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9 Natalie C. Webb

DATE

10 Legal Transcriber

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